

IN THE CIRCUIT COURT FOR PRINCE GEORGE'S COUNTY, MD
(CIVIL DIVISION)

Angela Dickerson
7209 Colmar Manor Way
Brandywine, MD 20613

Plaintiff,

vs.

Christopher Burgos
9200 Azure Ct. Apt. 102
Manassas, VA 20110

&

Laboratory Corp of America
1609 Westbrook Avenue
Burlington, NC 27215

Defendants

* * * * *

Case No.: C-16-CV-24-002713

COMPLAINT AND DEMAND FOR JURY TRIAL

Angela Dickerson, Plaintiff, by and through her attorney, Duane O. King, Esq.,
sues Christopher Burgos, and Laboratory Corp of America, Defendants, and states the
following:

CAUSE OF ACTION

Count I

EXHIBIT
1

(Automobile Negligence)

1. Plaintiff Angela Dickerson is a resident of Brandywine, MD.
2. Defendant Christopher Burgos is a resident of Manassas, VA.
3. Laboratory Corp of America is located in Burlington, NC.
4. On March 23rd, 2023, at approximately 1:52 PM, Plaintiff Angela Dickerson was sitting at a stop light at the intersection of Accoceek Rd. and Brandywine Rd., in Prince Georges County, MD.
5. Defendant Christopher Burgos was operating his vehicle traveling on Accoceek Rd. at or near its intersection with Brandywine Rd., and rear ended the vehicle that was being driven by Plaintiff Dickerson.
6. Defendant Burgos operated his vehicle in a negligent and careless manner by failing to pay full time and attention to the Plaintiff's vehicle and struck it in the rear.
7. Defendant Burgos, had a duty of care to operate his vehicle in a proper fashion, and the Defendant breached this duty of care by failing to operate his vehicle in a safe and proper manner.
8. Defendant Burgos' negligent conduct proximately caused the Plaintiff to suffer serious injuries and to suffer great mental anguish, loss of work, and wages. All such injuries were caused by solely by the negligence of Defendant Burgos, without any negligence by the Plaintiff.

PRAYER

WHEREFORE, the Plaintiff prays that she be awarded judgment as against Defendant Burgos to this complaint, Plaintiff requests the following for relief:

- a. That the court award the Plaintiff damages in the sum of four hundred fifty thousand dollars (\$450,000) individually against Defendant Burgos;
- b. That the Court award pre-judgment interest on all sums due to Plaintiff identified in this action;
- c. That the Court award attorneys' fees and costs of this action incurred by the Plaintiff identified in this action;
- d. That the Court award such other and further relief as may be proper and to which the Plaintiff is entitled.

Count II

(Respondeat Superior)

9. At all times relevant hereto, Defendant Christopher Burgos, was employed by Defendant Laboratory Corp of America as a driver of its vehicle.
10. At approximately 1:52 PM, on March 23rd, 2023, Defendant Burgos, while on duty as a driver, without provocation, negligently struck the vehicle in which the Plaintiff was traveling with the vehicle that was owned by Laboratory Corporation of America.

11. The above described acts of Christopher Burgos, were committed within the scope of his employment with Laboratory Corp of America, in that he committed them while on duty, and in furtherance of the Laboratory Corp of America's interests.
12. As Christopher Burgos' employer, Laboratory Corp of America is responsible for all of the acts committed by Christopher Burgos within the scope of his employment.

PRAYER

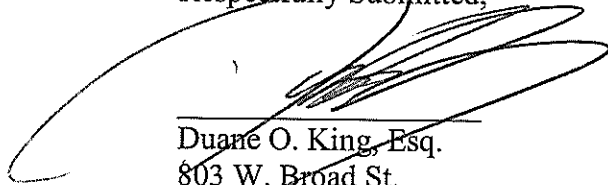
WHEREFORE, Plaintiff prays that she be awarded judgment as against the Defendant Laboratory Corp of America, to this complaint, Plaintiff requests the following for relief:

- d. That the court award Plaintiff the sum of four hundred fifty thousand dollars (\$450,000) individually against Laboratory Corp of America;
- e. That the Court award pre-judgment interest on all sums due to the Plaintiff identified in this action;
- f. That the Court award attorney's fees and costs of this action incurred by the Plaintiff identified in this action;
- e. That the Court award such other and further relief as may be proper and to which the Plaintiff is entitled.

JURY DEMAND

Plaintiff respectfully demands a jury trial in the aforementioned matter.

Respectfully Submitted,

A large, stylized handwritten signature in black ink, appearing to read 'Duane O. King', is written over the signature line and extends into the contact information area.

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